

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
DANIEL N. DICKENSHEETS	:	CASE NO. 1-19-00983-HWV
aka DAN N. DICKENSHEETS	:	
SHEELLY MAE DICKENSHEETS	:	CHAPTER 13
fka SHELLY M. GROFT, fka SHELLY	:	
KEENEY, aka SHELLY M.	:	
DICKENSHEETS,	:	
fka SHELLY MAE GROFT	:	
Debtors	:	
 THE BANK OF NEW YORK MELLON	:	
AS TRUSTEE FOR SWABS, INC.	:	
ASSET-BACKED CERTIFICATES,	:	
SERIES 2006-11	:	
Movant	:	
 v.	:	
 DANIEL N. DICKENSHEETS	:	
aka DAN N. DICKENSHEETS	:	
SHEELLY MAE DICKENSHEETS	:	
fka SHELLY M. GROFT, fka SHELLY	:	
KEENEY, aka SHELLY M.	:	
DICKENSHEETS,	:	
fka SHELLY MAE GROFT	:	
Respondents	:	

**DEBTORS' RESPONSE TO MOTION OF
THE BANK OF NEW YORK MELLON AS TRUSTEE FOR CWABS, INC.
ASSET-BACKED CERTIFICATES, SERIES 2006-11
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come Debtors, Daniel N. Dickensheets and Shelly Mae Dickensheets, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
2. Admitted.
3. Admitted.

4. Admitted in part and denied in part. Debtors have no knowledge as to the holder of the mortgage. Strict proof is demanded.

5. Admitted in part and denied in part. Debtors have no knowledge as to who services the loan. Strict proof is demanded.

6. Admitted.

7. Admitted. Further, Debtors have the funds necessary to pay the arrearage in a lump sum.

8. Admitted in part and denied in part. See response to paragraph 7.

9. Admitted in part and denied in part. Debtors have no knowledge as to the principal balance owed to Movant. However, Debtors admit that the amount owed on the mortgage exceeds the fair market value of the property. As such, Movant is not entitled to attorney's fees and costs for the bringing of this Motion. 11 U.S.C. § 506(b), United Savings Association v. Timbers of Inwood Forest Assocs., Ltd., 484 U.S. 365 (U.S. Supreme Court 1988).

10. Denied. Debtors are providing adequate protection through regular post-petition payments. To the extent that the post-petition payments are in arrears, Debtors will make an offer in the near future to bring same current.

11. Admitted in part and denied in part. See response to paragraph 9.

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WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order
denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
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Attorney for Debtors

DATED: 12/5/19

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing
DEBTORS' RESPONSE TO MOTION OF THE BANK OF NEW YORK MELLON AS TRUSTEE
FOR CWABS, INC. ASSET-BACKED CERTIFICATES, SERIES 2006-11 FOR RELIEF FROM
THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first
class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

JAMES C. WARMBRODT, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

Carol V. Shay

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For Debtors

DATED: 12/5/19